UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, AND BLACK ENTERTAINMENT TELEVISION, LLC,	)	
Plaintiffs,	)	No. 07-CV-2203
vs.	)	
YOUTUBE, INC., YOUTUBE, LLC, AND GOOGLE, INC.,	)	
Defendants.	)	
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated,	)	
Plaintiffs,	)	No. 07-CV-3582
vs.	)	
YOUTUBE, INC., YOUTUBE, LLC, AND GOOGLE, INC.,	)	
Defendants.	)	

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF ANDREW LIN

THURSDAY, JULY 2, 2009, 10:02 A.M.

LOS ANGELES, CALIFORNIA

Job No. 17155

148aaf66-7405-4ede-b447-b22b926bc84f

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FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, AND BLACK ENTERTAINMENT TELEVISION, LLC, Plaintiffs, vs. YOUTUBE, INC., YOUTUBE, LLC, AND GOOGLE, INC., Defendants.	No. 07-CV-2203
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated, Plaintiffs, vs. YOUTUBE, INC., YOUTUBE, LLC, AND GOOGLE, INC., Defendants.	No. 07-CV-3582

Videotaped deposition of ANDREW LIN taken on behalf of the Defendants, before Kimberly Reichert, Certified Shorthand Reporter No. 10986 for the State of California, commencing at 10:02 a.m. on Thursday, July 2, 2009, at Mayer Brown located at 350 South Grand Avenue, 25th Floor, Los Angeles, California.

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APPEARANCES OF COUNSEL:

For Plaintiff VIACOM INTERNATIONAL, INC., et al. and the witness:

JENNER & BLOCK, LLP
BY: SCOTT WILKENS, ESQ.
1099 New York Ave NW
Suite 900
Washington, District of Columbia 20001
(202) 639-6072
(202) 661-4832 Fax
swilkens@jenner.com

For Defendants YOUTUBE, INC., YOUTUBE, LLC AND GOOGLE, INC.:

WILSON SONSINI GOODRICH & ROSATI
BY: BART E. VOLKMER, ESQ.
650 Page Mill Road
Palo Alto, California 94304-1050
(650) 565-3508
(650) 493-6811 Fax
bvolkmer@wsgr.com

ALSO PRESENT: David Cavanaugh, Videographer

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I N D E X

WITNESS	EXAMINATION:	PAGE
ANDREW LIN	BY MR. VOLKMER	6, 77
	BY MR. WILKENS	75

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Defendants'		
1	E-mail from Andrew Lin to Kevin Donahue dated March 16, 2006 (1 page)	35
2	E-mail from Andrew Lin to Kevin Donahue top e-mail dated April 13, 2006 (1 page)	37
3	E-mail thread provided by Google top e-mail dated May 5, 2006 (3 pages)	47
4	E-mail from Andrew Lin to Kevin Donahue top e-mail dated May 21, 2006 (1 page)	61
5	E-mail from Andrew Lin to Kevin Donahue top e-mail dated June 23, 2006 (2 pages)	67
6	Article from The Wall Street Journal dated June 27, 2006 (5 pages)	70

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10:23:34 Q Anytime.

A To the best of my recollection, no.

Q And when you were employed at Paramount Vantage, you would use YouTube to promote Paramount 10:23:54 Vantage films; is that right?

MR. WILKENS: Objection as to form.

THE WITNESS: Again, to promote.

BY MR. VOLKMER:

Q I'll just make this a little easier.

10:24:12 When you were employed at Paramount Vantage, you would use YouTube in the course of your employment; correct?

A Correct.

Q And can you describe how you would use 10:24:23 YouTube?

A How I would use YouTube? We created accounts and we would upload trailers mainly to the account. There were -- there was a person there by the name of Kevin Donahue who helped us put the clip 10:25:10 onto the home page of YouTube. It was a -- I would say a symbiotic relationship. They were looking for content, good content, to help them, presumably, and we felt presumably that they could also help us.

Q By providing promotional opportunities for 10:25:36 your films?

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